



TRANSWESTERN PIPELINE COMPANY
An ENERGY TRANSFER Company

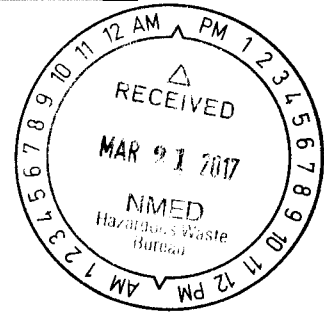
 ENTERED

March 17, 2017

via electronic mail

Mr. Dave Cobrain
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6313

Mr. Jim Griswold
New Mexico Oil Conservation Division
Environmental Bureau
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505



RE: Notice of Revisions to Operation and Maintenance (O&M) and Monitoring Plan
Transwestern Roswell Compressor Station No. 9
Transwestern Pipeline Company, LLC
Roswell, Chavez County, New Mexico
NMED 1656; NMOCD Case #GW-052
EPA ID NO. NMD986676955

Dear Cobrain and Griswold:

Transwestern Pipeline Company, LLC (Transwestern), in accordance with *Provision IV.A. Remediation System and Groundwater Monitoring* of the March 2013 *Stipulated Final Order* for Transwestern's Compressor Station No. 9 (Facility), is hereby providing this letter to notify both the New Mexico Environment Department (NMED) and the New Mexico Oil Conservation Division (OCD) that Transwestern is proposing revisions to the *Recovery System Operation and Maintenance (O&M) and Groundwater Monitoring Plans* for the Site.

Recovery System O&M – An evaluation will be performed to assess the effectiveness of the system for recovering chemicals-of-concern (COCs). The evaluation may include isolating and focusing recovery efforts to certain zones or circuits, which will require deactivation of certain recovery wells. Periodic flow and pressure measurements will be collected from wells, blowers, pumps and the process stream as part of the evaluation. In addition, further operation of pumps in recovery wells MPE-7, MPE-8 and MPE-9 do not appear warranted. Based on historical groundwater data, COCs have been reported below laboratory detection limits in MW-27 for several years, which is adjacent to MPE-7, MPE-8, and MPE-9. Therefore, it is recommended that the operation of recovery pumps be suspended temporarily in MPE-7, MPE-8 and MPE-9 to monitor rebound. If COCs or phase-separated hydrocarbons appear in MW-27, MPE-7, MPE-8, or MPE-9, the recovery wells will be reactivated.

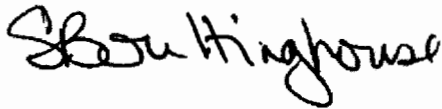
Groundwater Monitoring Plan - The historical groundwater data since 2009 collected from Site monitoring wells indicates the PSH and dissolved-phase plume is stable and contained within the Project Area by the remediation system. Based on this information, the groundwater sampling frequency for the *Sampling and Analysis Plan (SAP)* is recommended to be reduced from semi-annual to annual monitoring during active remediation. Specifically, the proposed modified SAP recommends suspending the April/May sampling event, and performing the annual sampling event in November of each year for those monitoring

wells identified in the 2015 SAP. Groundwater gauging will continue to be performed on a semiannual basis to monitor PSH and system recovery effectiveness. Once PSH is removed to the extent practical and the remediation system is deactivated for post-monitoring, additional revisions to the SAP may be submitted to monitor potential rebound during post-remedial monitoring. The proposed SAP during active remediation is provided in **Table 7-1** attached to this document.

Except for the proposed modifications requested above, monitoring activities at the Site will continue as described in the *Notice of Revisions to the Operation and Maintenance (O&M) and Monitoring Plans*, dated May 27, 2015.

If you have any questions or comments regarding this submission, please do not hesitate to contact me at 210.870.2725 (office) or JD Haines of EarthCon Consultants, Inc. at (317) 450-6126.

Sincerely,



Stacy Boultinghouse, PG (TX4889/LA73)
Environmental Manager
Transwestern Pipeline Company, LLC
Stacy.Boultinghouse@energytransfer.com

ec: Neelam Dhawan, Hazardous Waste Bureau, New Mexico Environment Department
Robert Murphy, Hazardous Waste Bureau, New Mexico Environment Department
New Mexico Oil Conservation Division (Artesia)
Laurie King, US Environmental Protection Agency - Region 6
Larry Campbell - Transwestern Pipeline Company (Roswell, NM)
JD Haines - EarthCon Consultants, Inc.

Table

**Table 7-1. Proposed Sampling and Analysis Plan
Transwestern Compressor Station No. 9 - Roswell, NM**

Well ID	2nd Semiannual Event Analytical Requirements	Date of Most Recent Sample	Benzene (ppb) Most Recent Sample	1,1-Dichloroethene (1,1-DCE) (ppb) Most Recent Sample	Consecutive Events < NMWQCC Standard or EPA MCL	Comments
MW-13	BTEX	11/17/16	< 1	NA	20	Previously contained elevated benzene
MW-14	BTEX	11/16/16	< 1	NA	9	Previously contained elevated benzene
MW-16	BTEX	11/16/16	90	NA	0	PSH in well, sampled below PSH
MW-20	VOCs	11/16/16	< 1	8.6	0	COCs: DCA, DCE, TCA
MW-21	BTEX	11/16/16	< 1	NA	19	Previously contained elevated benzene
MW-22	VOCs	11/16/16	< 1	2.6	27	COCs: DCA, DCE, TCA
MW-24D	BTEX	11/17/16	< 1	NA	6	Clean deep well
MW-26	VOCs	11/16/16	< 1	58	0	COCs: DCA, DCE, TCA
MW-27	BTEX	11/15/16	< 5	NA	1	Previously contained PSH in well
MW-29	BTEX	11/15/16	< 1	NA	13	Previously contained elevated benzene
MW-32	BTEX	11/15/16	< 1	NA	19	Previously contained elevated benzene
MW-34	BTEX	11/15/16	< 1	NA	5	Previously contained elevated benzene
MW-35	BTEX	11/15/16	< 1	NA	28	Clean downgradient well
MW-37	BTEX	11/15/16	< 1	NA	18	Clean downgradient well
MW-39	VOCs	11/17/16	< 1	22	0	COCs: DCA, DCE, TCA
MW-40	VOCs	11/17/16	< 1	< 1	6	Clean downgradient well
MW-41	VOCs	11/17/16	< 1	1.2	6	COCs: DCA, DCE, TCA
MW-42	VOCs	11/17/16	< 1	< 1	6	Clean downgradient well

Notes:

- 1) Non-detect results are shown with the "<" symbol followed by the reporting limit
- 2) NA - Not analyzed
- 3) BTEX (Benzene, Toluene, Ethylbenzene and Xylenes) and VOCs (Volatile Organic Compounds) to be analyzed by EPA method 8260
- 4) ppb - parts per billion
- 5) NMWQCC - New Mexico Water Quality Control Commission
- 6) EPA MCL - United States Environmental Protection Agency's Maximum Contamination Level
- 7) The 2015 SAP presented in the May 27, 2015 *Notice of Revisions to the O&M and Monitoring Plan* was approved by NMED on August 12, 2015.
- 8) Monitoring wells MW-5, MW-6, MW-8, MW-9, MW-18, MW-19, MW-23D, MW-25D, MW-31, MW-36, and MW-38 were plugged and abandoned in August 2013.